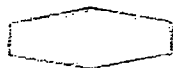


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ASH GROVE CEMENT COMPANY



TEST FOR REGION

August 25, 2003

Northwest Regional Office
Department of Ecology
Attn: David Johnson
3190 160th Ave SE
Bellevue, WA 98008-5452

Re: Pollution Prevention Plan - Test for Inactivity Facility Status

Dear Mr. Johnson:

The following is submitted for exemption from the requirement found in Chapters 103-305 and 307 of the Washington Administrative Code:

I. Facility Identity and reason for exclusion:

Ash Grove Cement Co
3801 E Marginal Way So.
Seattle, WA. 98134

ID Number: WAD009249616

The above facility should be excluded from requirement per Chapters 103-305 and 307 of the Washington Administrative Code as it meet the test for inactive facility status. Ash Grove's facility generates less than 2,640 lbs. of dangerous waste annually. The process of manufacturing of Portland Cement at the Seattle Plant does not use hazardous materials to produce a product and there are no opportunities to reduce hazardous substance use and/or hazardous waste generation. The emissions from the facility are regulated under permits issued by Puget Sound Air Pollution Control Agency. As intended, "P2" planning will not serve to benefit the facility nor the general public.

II. Maximization of efficient use of hazardous substances or hazardous raw materials

The facility does not use and is not permitted to use hazardous raw materials or fuels in the manufacture of Portland Cement.

III. The effect using less hazardous substances would have on the facility's production level and economic viability

Raw materials and fuels used in the manufacture of Portland Cement are non-hazardous and Ash Grove's cement kiln produces no solid waste. All of the captured baghouse catch is recycled into the kiln as raw material. The baghouse has a 99.99% capture efficiency.

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IV. Efforts to thoroughly investigate pollution prevention opportunities for any hazardous wastes used.

Ash Grove's Seattle Plant does not use hazardous waste in its process.

V. Company efforts to thoroughly investigate pollution prevention opportunities for any hazardous wastes generated

In the past, non-hazardous products have been identified and obtained to replace the product that generates a hazardous waste stream. The facility continues this practice and looks for similar viable opportunities to reduce all wastes. Included in Ash Grove's Environmental Policy (see Ash Grove Environmental Policy attached) are the following points:

- * The minimization of the release from its operations of constituents that may cause pollution or environmental damage, wherever practicable.
- * The minimization of the creation of waste, wherever practicable in its operations, and the safe and responsible disposal of such wastes in compliance with applicable laws and regulations.
- * The education and training of its employees in the conduct of operations in an environmentally responsible manner

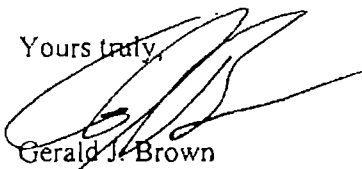
The Seattle Plant operates in compliance with applicable regulatory requirements. The facility has identified several opportunities to avoid waste generation. Currently, our program recycles used materials generated in the operation of the facility such as used motor oil, antifreeze, scrap steel, wood, paper, computer components, batteries etc. Authorized organizations are used to recycle these products for beneficial reuse. Employees are trained in environmental awareness and waste reduction programs.

VI. Why would P2 planning and reporting not provide be beneficial to the facility or the general public.

Ash Grove's Seattle facility does not use hazardous raw materials or fuels to operate the kiln in producing Portland Cement. The kiln does not generate waste products as all the raw materials are used in the production of cement clinker. Ash Grove generates less than 2,640 lbs. of dangerous waste annually and is currently recycling much of the re-useable material it generates. P2 planning and reporting would not serve its intended purpose at this facility.

Please advise should you need additional information.

Yours truly,



Gerald J. Brown

Manager Safety and Environmental